

**Follow-up NJDEP Comment on Draft Proposed Plan for 600 Hill Waste Pit (600 HILL
Groundwater Plume [PICA-058/Site 12]
and Inactive Munitions Waste Pit, Munitions Response Site [PICA-013-R-01])
Picatinny Arsenal, New Jersey
Submitted: February 6, 2018**

Comment provided by Joe Marchesani, NJDEP on April 29, 2018 letter. Responses will be incorporated in the Final PP text in RLSO.

General Comment

A 6- inch diameter 430-foot-deep potable supply well was drilled in 1994 to provide water to the new building 660. Sampling of groundwater in the well indicated TCE contamination above NJDEP criteria. Subsequent investigations and sampling indicated MTBE and RDX contamination; however, it is not above applicable criteria. The source area for the TCE is identified as the inactive waste pit, containing at least one buried drum of TCE along with unexploded ordinance/ military munitions hazards.

The preferred remedy for the groundwater TCE contamination is ***Alternative 6- Total Munitions Waste Pit Removal, TCE source Material Removal, MNA polishing and Land Use Controls***. The excavation would then be backfilled with clean fill. The remedial timeframe is listed as reasonable. Reasonable is explained in the report as less than 50 years.

Army Response: No response required.

NJDEP Specific Comment - The report is approvable. Picatinny should investigate modifying the clean backfill (if the water table is encountered) with amendments (to promote microbial degradation) across the water table which will help reduce the remedial timeframe. A permit by rule equivalent would be required to backfill with amendments with discharge to the water table.

Army Response: Following the excavation of the total munitions waste pit, including the TCE-contaminated source soil, a carbon substrate amendment will be added to the excavation to enhance degradation of any residual contamination in the source area and the excavation will then be backfilled with clean fill to restore existing site contours. The carbon substrate application language has been added to the PP under the description of Alternative 6, similar to the description under Alternative 5 in the SUMMARY OF REMEDIAL ALTERNATIVES section. The quantity of EVO will also be assumed to be the same as that for Alternative 5, and the cost in Table 10 for Alternative 6 has been updated to include the amendment application, with a note added to clarify this change from the FS cost. A discharge permit equivalent will be obtained, as noted in the comment.